

EXHIBIT B

Summary of Documents Produced by Guidant

(as of January 14, 2006)

Production	Document Category	Pages
October 27 (1 st)	PMA Submissions	259,700 pages
	Technical Guides & System Manuals	10,324 pages
	Trend Reports & Other Documents	451 pages
November 4 (2 nd)	Product Performance Reports	287 pages
November 8 (3 rd)	Annual Reports	1399 pages
November 10 (4 th)	Third-Party Rocco Rossinni Production (Hard Copy Documents)	236 pages
November 18 (5 th)	Third-Party Rocco Rossinni Production (Electronic Documents)	16,441 pages
December 1 (6 th)	CRM Organizational Charts	2,184 pages
	Document Retention Policies	2,339 pages
	PowerPoint presentation about Prizm 1861 device failures	16 pages
December 15 (7 th)	Data dumps from certain plaintiffs' devices	10,773 pages
	Marketing Materials for Physicians	119 pages
	Sales Training Material	936 pages
December 16 (8 th)	CD	
	Brennan-Jones	5 pages
	Clasby-Eugene	10 pages
	Cotter-Brian	4 pages
	FDA_Approval	36 pages
	Franklin-Jerry	12 pages
	Gabriele-Joseph	7 pages
	Munson-Darci	7 pages
	PDM-Trend-04018	16 pages
	PDM-Trend-04028	112 pages
	Testing_Protocols	61 pages
	Walker-Edith	10 pages
	Weing-Larry	5 pages
	HD	
	VENTAK-PRIZM-2-Model	
	-Project File	456,040 pages
January 3 (9 th)	H135 and H155 Files (incomplete)	706,584 pages

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Production	Document Category	Pages
December 29 (9a)	Rocco Rossinni Documents	16,467 pages
January 10 (10 th)	1861 Event Summaries	153 pages